

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**CONCORD MANAGEMENT AND  
CONSULTING LLC**

**Defendant.**

**Crim. No. 18-CR-32-2 (DLF)**

**GOVERNMENT'S MOTION FOR LEAVE TO FILE UNDER SEAL**

The United States of America respectfully moves for leave to file under seal a supplement to its opposition to the motion of defendant Concord Management and Consulting LLC for a bill of particulars. Dkt. No. 111. The supplement discusses the content of sensitive discovery, and therefore is appropriately filed under seal pursuant to the protective order in this case.

Respectfully submitted,

ROBERT S. MUELLER, III  
Special Counsel

By: /s/  
Michael R. Dreeben  
Jeannie S. Rhee  
Adam C. Jed  
950 Pennsylvania Avenue NW  
Washington, D.C. 20530  
Telephone: (202) 616-0800

JOHN C. DEMERS  
Assistant Attorney General for National Security

By: /s/  
Heather N. Alpino  
U.S. Department of Justice  
National Security Division  
950 Pennsylvania Ave. NW

JESSIE K. LIU  
United States Attorney

By: /s/  
Jonathan Kravis  
Deborah Curtis  
Kathryn Rakoczy  
555 Fourth Street NW  
Washington, D.C. 20530  
Telephone: (202) 252-6886

Washington, D.C. 20530  
Telephone: (202) 514-2000

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**CONCORD MANAGEMENT AND  
CONSULTING LLC,**

**Defendant.**

**Crim. No. 18-CR-32-2 (DLF)**

**PROPOSED ORDER**

Upon consideration of the government's motion for leave to file under seal a supplement to its opposition to the defendant's motion for a bill of particulars, it is hereby

ORDERED that the government's motion is GRANTED.

Date: March \_\_\_, 2019

\_\_\_\_\_  
Hon. Dabney Friedrich  
United States District Judge